



December 17, 2004

Dr. John Faust  
Senior Toxicologist  
Office of Environmental Health Hazard Assessment  
1515 Clay Street, 16th Floor  
Oakland, CA 94610  
jfaust@oehha.ca.gov

Re: CalEPA Environmental Justice Action Plan Implementation  
"Multi-media Cumulative Impacts"

Dear Dr. Faust:

Thank you for the opportunity to provide comment on the definition of "Multi-media Cumulative Impacts" under CalEPA's Environmental Justice Action Plan (EJ Action Plan.)

The Industrial Environmental Association has been an active participant during the past couple of years in CalEPA's environmental justice considerations, including serving on the Air Resources Board's Environmental Justice Stakeholders Group and participating in EJ Advisory Panel Meetings and the Interagency Working Group.

We would like to direct our comments to the need to clearly define "multi-media cumulative impacts." We would support a suggested definition as follows:

"Multi-media cumulative impacts mean the adverse health risk posed by exposure to pollutants from multiple pollution sources."

This definition takes into account the multi-media aspect by referring to "pollution sources" as opposed to, for example, just air pollution and is also consistent with OEHHA's guidance on health risk assessment that incorporates both cancer and noncancer risk.

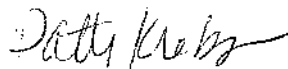


Page 2

We also believe that social factors should not be included in this definition but rather addressed in a broader community and neighborhood-based context.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Patti Krebs", with a long horizontal flourish extending to the right.

Patti Krebs  
Executive Director